

In the Matter of)
Expanding the Economic and Innovation) Docket No. 12-268
Opportunities of Spectrum)
Through Incentive Auctions)

October 24, 2013

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October 24, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth St, S.W.
Washington, DC 20554

Re: *Clarification of October 23, 2013 Comments to Docket No. 12-268*

Dear Ms. Dortch:

The LPTV Spectrum Rights Coalition submitted Comments yesterday, October 23, 2013, titled, "*The Case for LPTV Flexible Use Service Waivers*", and we need to make a clarification of a key point being asserted by us. The Coalition stated:

"Two major broadcast ownership groups, [Sinclair Broadcasting Group, Inc.](#), and [Gray Television, Inc.](#), have each recently submitted NPRM comments which officially declare their intention to decline Spectrum Auction relocation funds if they can receive these flexible use service waivers *prior to* the spectrum auction."

Upon further review of the NPRM record the Coalition should have stated:

"Two major broadcast ownership groups, [Sinclair Broadcasting Group, Inc.](#), and [Gray Television, Inc.](#), have each recently submitted NPRM comments which advocate that the FCC should permit flexible use waivers to broadcasters willing to forego relocation and channel repacking funds."

The major difference in the two statements is that *neither mentioned broadcasting company has yet to declare their intention, or would give up their rights to relocation and channel repacking funds prior to the auction process.* The Coalition agrees with this distinction and clarification; and, it continues to advocate that ALL television broadcasters (Primary, Class-A, and LPTV) should be afforded the option of obtaining flexible use service waivers *prior to* the auction process.

Respectfully submitted,

_____/S/_____
Mike Gravino
Director